

Oil Spill Responders Panel

Lessons, Capabilities and Recommendations

PHMSA Public Workshop
April 12, 2016
Washington DC

Who We Are

- Established in 1973
- Represent Oil Spill Removal Organizations (OSROs), spill management, manufacturers and distributors of equipment serving the nation's response community
 - Current membership is 94 member organizations
- Active involvement and engagement with Government and other industry stakeholders
 - Partnership Action Teams (PAT)
 - Government/Industry Workgroups
 - Industry expertise

On-Shore Pipeline Incidents

Common Challenges

- Property access
- Rapid access to full SDS information and/or other hazard assessment tools
- Remote location operations
- Multi-jurisdictional challenges & stakeholder competition
- Sustained operations
- Impact of social media and public expectations

The Common Thread

Human Capital

- Operator Qualification (OQ) Standards
- NCCR Certifications & ISNetworld Compliance
- Substance Abuse Compliance – multiple levels
- Client specific training and internal policies
- Employee recruitment, retention and development
 - CDL Driver shortage and hours of service challenges
 - Millennials - transfer of institutional knowledge and culture

SCAA Recommendations

- Consistency and an “Even Playing Field”
 - Contractors requirements
 - “OSRO economics”
- More timely land access approvals
- Continued participation in appropriate planning meetings
 - AC, LEPC other
 - Drills and exercises

Recent Research & Pending Regulatory Changes Non-Floating Oils

- United States Coast Guard (USCG) R&D Center report on Development of Bottom Oil Recovery systems – June 2013
- ***American Petroleum Institute (API) Technical Report on Sunken Oil Detection and Recovery – February 2016***
- National Academy of Sciences (NAS) report on Impact of Bitumen Spills from Inland Pipelines – January 2016
- ***United States Coast Guard (USCG) Oil Spill Removal Organization (OSRO), Classification Program for Non-Floating Oils – April 2016***

Implications to Spill Response Industry

- Emerging regulations and industry awareness as to the challenges of detection, containment and recovery of non-floating oils
 - ICS – 209 Oil Budgets
- Recognizes “one size does not fit all”
 - Options and decision matrices
 - Responses require a rapid, organized and systematic approach
- Establishes pathway for research, data collection and continual improvement
 - BSEE research & other

USCG OSRO Classification Non-Floating Oils

- Revision to Existing OSRO Guidelines
- New Classification System for Non-Floating Oils
 - Enhancement from former Group V capabilities designation
 - Identifies specific Core Resource requirements
 - *Specific environmental conditions*
 - Two Classifications
 - Level I: up to 190 fsw depth, 24 hour on-site response
 - Level II: greater than 190 fsw depth, 24 hour on-site response

Harmonizing Response Plans

- 33CFR154 Response Plans for Marine Facilities
- 33CFR155 Response Plans for Vessels
- 49CFR194 Response Plans for on-Shore Pipelines

Harmonization

Implications and Potential Considerations?

- Planning Standard vs. Performance Standard
 - Expectations
- WCD1 Planning Standard
 - Marine Facility & Vessels (USCG) vs. On-Shore Pipelines (PHMSA)
 - EDRC Based Classification – *evolving to ESRP approach*
- Response Resource Inventory (RRI)
 - Core Resources
 - Preparedness Assessment Visits (PAVs)

SCAA Membership Response to Challenges

Improving the Nation's response network

- Expanding of Partnership Action Team (PAT) Process
- Encouraging membership to be actively engaged in AC & LEPC Meetings
- Advancing technology and capability enhancements
- Providing subject matter expertise and input
- Future Environmental Leaders (FEL) Program

Thank You!

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